

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Johnnie M. DuBose,)	
Plaintiff,)	
)	
v.)	C.A. No. 07-045(***)
)	
Michael Walsh, American Business Credit,)	
Robert K. Beste, Jr. and Maggie Clausell,)	
Defendants.)	

**MOTION TO JOIN AND MOTION TO DISMISS MICHAEL WALSH
AND THE NEW CASTLE COUNTY SHERIFF**

Defendants Michael Walsh and the New Castle County Sheriff by and through their attorney, move to join and adopt the motion to dismiss filed by co-defendants Robert K. Beste, Jr., Esquire (D.I. 9 and 10) and Maggie Clausell, Esquire (D.I. 12 and 13) and further, respectfully moves this Honorable Court for an Order dismissing this action against the moving defendants, for the reasons more fully set forth in the Opening Brief filed herewith.

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234
Donald L. Gouge, Jr. (DSB # 2234)
800 King Street, Suite 303
P.O. Box 1674
Wilmington, DE 19801
(302) 658-1800
(302) 658-1473 (fax)
dgouge@hgkde.com

Date: March 5, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Johnnie M. DuBose,)	
Plaintiff,)	
)	
v.)	C.A. No. 07-045(***)
)	
Michael Walsh, American Business Credit,)	
Robert K. Beste, Jr. and Maggie Clausell,)	
Defendants.)	

CERTIFICATE OF SERVICE

The undersigned certifies that on the date listed below that the attached motion to join and dismiss Michael Walsh and the NCC Sheriff was served as indicated below.

Johnnie M. DuBose (U.S. Mail)
4 Teakwood Lane
Wilmington, DE 19801

Robert K. Beste, Jr., Esquire (By Hand & Electronically)
1007 N. Orange Street, Suite 1130
Wilmington, DE 19801

Paul Cottrell, Esquire (By Hand & Electronically)
704 King Street, Suite 500
Wilmington, DE 19801

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234
Donald L. Gouge, Jr. (DSB # 2234)
800 King Street, Suite 303
P.O. Box 1674
Wilmington, DE 19801
(302) 658-1800
(302) 658-1473 (fax)
dgouge@hgkde.com

Date: March 5, 2007